

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Case No. 14-cv-13829

Hon. Gershwin Drain

ERICA MORENO, and)
KATTI PUTNAM)
Plaintiffs)
v.)
)
MICHIGAN DEPARTMENT OF CORRECTIONS)
ABSCONDER RECOVERY UNIT INVESTIGATOR)
RON HUGHES,)
Defendant.)

/

PLAINTIFFS' WITNESS SYNOPSIS

Plaintiffs through their counsel, **OLSON PLLC**, state the following
for their Witness Synopsis:

1. **Plaintiff Putnam** is anticipated to testify about her dog, her ownership and care of her dog, her relationship with her dog, the shooting incident, its precedents and aftermath and the damages that Defendants' shooting of her dog caused her and Plaintiff Moreno. **Anticipated direct examination and cross-examination time 2-3 hours.**

2. **Plaintiff Moreno** is anticipated to testify about her dog, her ownership and care of her dog, her relationship with her dog, the shooting incident, its aftermath and the damages that Defendants' shooting of her dog

caused her and Plaintiff Putnam. **Anticipated direct and cross-examination is 2-3 hours.**

3. **Jimmy Armstrong**, 1024 Alvord, Flint, Michigan 48507, is anticipated to testify that he lived next door to Plaintiffs on the date of the shooting incident, that he knew Clohe as a friendly and gentle dog, that on or about June 18, 2014, he saw Defendant shoot Clohe who had just come down the stairs to go into the back yard, that Clohe was not attacking or threatening the Defendant at any time and that the Defendant shot Clohe for no reason at all. **Anticipated direct and cross-examination time 1-2 hours.**

4. **Defendant** is anticipated to testify about the shooting incident itself, its precedents and aftermath. **Anticipated direct and cross-examination time 2-3 hours.**

5. **Trooper Joe Cavanaugh**, 3d District Fugitive Team, 4495 Corunna Road, Flint, Michigan 48532 is anticipated to testify about the shooting incident and its precedents and aftermath. **Anticipated direct and cross-examination time 1 hour.**

6. **Det. Joe Jones** is anticipated to testify about the shooting incident and its precedents and aftermath. **Anticipated direct and cross-examination time 1 hour.**

7. **Jim Loxton**, Michigan Department of Corrections is anticipated to testify about the investigation and reporting of the shooting incident. **Anticipated direct and cross-examination time 1 hour.**

8. Keeper of the records of Veterinary Medical Hospital, G3252 Miller Road, Flint, Michigan 48507 will authenticate veterinary records and photos. **Anticipated direct and cross-examination time 15 minutes.**

Respectfully submitted,

OLSON PLLC

/s/Christopher S. Olson
Christopher S. Olson (P58780)
32121 Woodward Avenue
Suite 300
Royal Oak, Michigan 48073
(248) 672-7368
(248) 415-6263 Facsimile
colson@olsonpllc.mygbiz.com
Attorney for Plaintiffs

Dated: February 11, 2016